

REMARKS

Claims 1-31 are pending in the present application. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 102, Anticipation

The Office Action rejects claims 1-31 under 35 U.S.C. § 102 as being anticipated by *Poon* (U.S. Pub. No. 2002/0062265). This rejection is respectfully traversed.

Poon is directed to a system for facilitating category selection by a user in a computerized auction. In the *Poon* system, a category field is provided, containing a plurality of category entries used to categorize an item in the auction. A client selects one category entry in a category field and a server provides at least one subcategory field. A plurality of subcategory entries is used to categorize the item in the auction, the subcategory entries corresponding to the user selected category entry of the plurality of category entries. At least one subcategory entry corresponding to the one selected category entry is further selected in the at least one subcategory field for further processing.

Thus, in the *Poon* system a user selects a category entry from a plurality of categories, and the server responds with a list of subcategories for the user selected category. This process continues until there are no further subcategories and then the final selected category is used for item registration. The Office Action alleges that *Poon* teaches receiving a registration request at the data processing system, the registration request including a **service description and an identification of a category** within the taxonomy in which the service is to be registered at "p. 49-50, 26-32." Because there are no paragraphs 49-50 in *Poon*, Applicants assume the Office Action is referring to pages 26-32 and 49-50. Pages 26-32 of *Poon* list hundreds of categories and subcategories. Pages 49-50 of *Poon* describe classifying items to be involved in online auctions into categories and subcategories.

In this rather lengthy section, *Poon* teaches receiving a selection of a category from a user, determining if there are subcategories associated with the received category, and responding to the user with the subcategories if subcategories exist for the selected category. Thus, *Poon* fails to teach receiving a registration request that includes a **service description and an identification of a category**, as recited in claim 1, for example. Rather, the request sent from

the client in *Poon* merely contains a selection of a category and then the client must perform further steps in an item registration process.

Additionally, *Poon* fails to teach determining if the service description should be registered in the identified category based on a canonical service description associated with the category. The server of *Poon* merely determines if there are related subcategories associated with the category selection received from the user. Nowhere in *Poon* is there a teaching of a canonical service description associated with a category. The Office Action merely alleges that *Poon* teaches the claimed feature in a seemingly arbitrary, albeit lengthy, portion of the reference. The Office Action proffers no analysis as to why the cited portion somehow anticipates determining whether the service description should be registered in the identified category based on a canonical service description associated with the category. Also, there is no service description received in a request from the client in the *Poon* system.

Furthermore, *Poon* does not teach registering the service description in the identified category using the data processing system if the determination is that the service description is that the service description should be registered in the identified category. As discussed previously, *Poon* merely teaches receiving a category selection and does not determine if the service description should be registered in the identified category based on a canonical service description associated with the category. *Poon* relies on the user to determine what category the item should be listed in and only determines whether there are further subcategories for selection.

Independent claims 11, 21, and 31 recite subject matter addressed above with respect to claim 1. Thus, *Poon* does not teach each and every feature of independent claims 1, 11, 21, and 31 as is required under 35 U.S.C. § 102. Since claims 2-10, 12-20, and 22-30 depend from claims 1, 11, and 21, the same distinctions between *Poon* and the invention recited in claims 1, 11, and 21 apply for these claims. Additionally, claims 2-10, 12-20, and 22-30 recite other additional combinations of features not suggested by the reference.

Furthermore, *Poon* does not teach, suggest or give any incentive to make the needed changes to reach the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement *Poon* such that a registration request is received at the data processing system, the registration request including a service description and an identification of a category within the taxonomy in which the service is to be registered and whether the service description should be registered in the category is determined based on a canonical service

description associated with the identified category, one of ordinary skill in the art would not be led to modify *Poon* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion or incentive to modify *Poon* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

With respect to claims 2, 12, and 22, *Poon* does not teach wherein the canonical service description identifies minimum criteria for the category. As discussed previously the only test applied by *Poon* is whether the user selected category has related subcategories. There is no test applied by *Poon* that determines whether a service description should be registered with an identified category based on a canonical service description associated with the category, particularly where in the canonical service description identifies minimum criteria for the selected category.

With respect to claims 3, 13, and 23, the Office Action alleges that *Poon* teaches storing the service description and an associated model description in a storage device in association with the registered category at p. 49-50, 26-32, which is as discussed above. The cited portion makes no mention whatsoever of storing a service description and an associated model description. The Office Action proffers no analysis as to why *Poon* anticipates this feature other than to cite a seemingly arbitrary, albeit lengthy, portion of the reference. The Office Action fails to establish a *prima facie* case of anticipation for claims 3, 13, and 23.

With respect to claims 5, 6, 15, 16, 25, and 26, the Office Action alleges that *Poon* teaches receiving a request to add a new category, adding a new category, and registering the service description in association with the new category at p. 49-50, 26-32. Again, this cited portion makes no mention whatsoever of adding a new category. The categories and subcategories are explicitly defined within the code, as evidenced on pages 26-32. In fact, *Poon* actually teaches away from the claimed invention, because the categories and subcategories of *Poon* constrain the input of the user, rather than receiving an identification of a category, receiving a request to add a new category, and adding the new category, as in claims 5, 6, 15, 16, 25, and 26.

Furthermore, with respect to claims 7, 17, and 27, *Poon* does not teach or suggest a canonical service description associated with a category, as discussed above. Therefore, it

follows that *Poon* does not teach the further limitation of a canonical service description that includes information identifying minimum requirements of the category regarding one or more security requirements, privacy requirements, and communication protocol requirements. The cited portion provides no such teaching. To the contrary, *Poon* teaches categories and subcategories that are navigated by a user. As soon as the user selects a subcategory, the user then proceeds with item registration. See *Poon*, paragraph [0029]. *Poon* does not teach any determination beyond user selection of a category. That is, *Poon* does not teach any determination of whether a service description should be registered in an identified category based on a canonical service description associated with the category. It follows that *Poon* does not teach the further limitation of a canonical service description that includes information identifying minimum requirements of the category regarding one or more security requirements, privacy requirements, and communication protocol requirements.

Still further, with respect to claims 8-10, 18-20, and 28-30, *Poon* does not teach searching a taxonomy for an alternate category in which a service description should be registered if it is determined that the service description should not be registered with the identified category. Once again, the Office Action points to the same lengthy portion of the reference with no explanation as to why the claim limitations are anticipated. Thus, the Office Action does not establish a *prima facie* case of obviousness for claims 8-10, 18-20, and 28-30.

Therefore, Applicants respectfully request withdrawal of the rejection of claims 1-31 under 35 U.S.C. § 102.

II. Conclusion

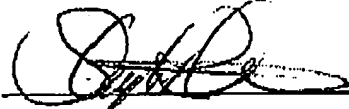
It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE:

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Respectfully submitted,



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